



Mirel Fisch <mirel.grandinettelaw@gmail.com>

Fwd: Sargent Kevin O'Rielly PO Joseph Simeone

1 message

Anthony Grandinette <grandinettelaw@gmail.com>

Thu, Jan 1, 2015 at 5:27 PM

To: Mirel Fisch <Mirel.Grandinettelaw@gmail.com>

----- Forwarded message -----

From: **Anthony M. LaPinta** <LaPintaEsq@aol.com>

Date: Wed, Nov 26, 2014 at 5:07 PM

Subject: Re: Sargent Kevin O'Rielly PO Joseph Simeone

To: Anthony Grandinette <grandinettelaw@gmail.com>

We don't represent the Sergeant. Never did.

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On Nov 26, 2014, at 4:57 PM, Anthony Grandinette <grandinettelaw@gmail.com> wrote:

Gentlemen:

I hope this e-mail finds you both well and somewhat rested following the Thanksgiving holiday. I have enclosed a letter and **Non Party** Notice of Deposition for your respective clients in relation to a civil action pending in the EDNY before Joanna Seybert. I have also annexed a proposed amended complaint, which although not yet formally approved, I anticipate being adopted, and subsequently served upon your clients alleging substantially all of the asserted claims.

Magistrate Locke has directed me to proceed with discovery prior to the formal decision on Plaintiff's motion to amend the complaint. However, to be completely forthcoming and to give you advance notice of the allegations which my client seeks to assert against yours in the future, I have annexed a copy of the proposed amended complaint and all the exhibits annexed thereto. In this way you can properly prepare and advise your respective client's mindful of plaintiffs' intent to name them as Defendants' in this action and the specific factual allegations asserted against them.

Please call me at your leisure to discuss this further in person. I can be reached on my cell as well at [516 456-2695](tel:5164562695).

Kind regards, Tony

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[Anthony M. Grandinette](#)

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<Amended Summons and Complaint.pdf>

<Exhibit A - Franqui Notice of Claim.PDF>

<Exhibit B - Earl Notice of Claim.PDF>

<Exhibit C - Pics with Dog.PDF>

<Exhibit D - Autopsy Report.PDF>

<Exhibit E - Parlor pics.PDF>

<Exhibit F - Arrest paperwork.PDF>

<Exhibit G - Prisoner Activity Log.PDF>

<Exhibit H - Burke 50(h).PDF>

<Exhibit I - Burke July 3 2013 aff.PDF>

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